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/// **166-78 Townsend Street**

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**Draft Environmental Impact Report**

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**94.265 E**

Draft EIR Publication Date: February 24, 1995

t EIR Public Hearing Date: April 6, 1995

t EIR Public Comment Period: February 24, to April 6, 1995

D

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**City and County of San Francisco  
The Planning Department**



**1660 Mission Street  
San Francisco, CA 94103-2414**

**DATE:** February 24, 1995

**TO:** Distribution List for the 166-78 Townsend Street Project Draft EIR

**FROM:** Barbara W. Sahm, Environmental Review Officer

**RE:** Request for Final Environmental Impact Report for the 166-78 Townsend Street Project

---

This is the Draft of the Environmental Impact Report (EIR) for the 166-78 Townsend Street project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Summary of Comments and Responses" which will contain a summary of all relevant comments on this Draft EIR and our responses to those comments; it may also specify changes to this Draft EIR. Public agencies and those members of the public who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with a notice of the date reserved for certification of the EIR; others may receive such copies and notice on request or by visiting our office. This Draft EIR together with the Summary of Comments and Responses document will be considered by the City Planning Commission in an advertised public meeting and certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final Environmental Impact Report. The final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one rather than two documents. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information again after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like to receive a copy of the Final EIR, therefore, please fill out and mail the post card provided on the back cover of this document within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy.

Thank you for your interest in this project.

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City and County of San Francisco  
Department of City Planning

## **166-78 TOWNSEND STREET**

### **Draft Environmental Impact Report**

94.265E

Draft EIR Publication Date: February 24, 1995

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166-78 Townsend Street :  
draft environmental  
1995.



**166-78 Townsend Street  
Draft Environmental Impact Report**

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Draft Environmental Impact Report**

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## **I. SUMMARY**

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### **A. Project Description**

The proposed project would reinforce parapets and remove an approximately 120-foot tall brick smokestack associated with the building at 166-78 Townsend Street, which is a contributing building within the locally designated South End Historic District. Known as the California Electric Light Company Building, the building was constructed in 1888 as an electrical power plant and was modified slightly, probably immediately following the earthquake and fire of 1906. The monumental brick smokestack was built in 1888 as part of the original building and was used until 1905 or 1906 when the building ceased to be used as a power plant. The smokestack's height has been variously estimated at 60 to 175 feet. Historical records describe it as rising 150 feet from the ground, and about 120 feet from the building roof.<sup>1</sup> No change of use or occupancy is proposed as part of the project.

### **B. Areas of Controversy and Issues to be Resolved**

The primary area of controversy associated with the proposed project is whether the smokestack should be demolished, or whether it should be reinforced and retained. Those who support demolition feel that the smokestack poses a potential safety hazard and a liability problem. Those who support retention of the smokestack cite the structure's historic significance and have argued that the smokestack could be reinforced and retained for a cost that is not drastically different from the cost that would be associated with the smokestack's removal.

While economic issues such as the cost of removal or reinforcement of the smokestack are not environmental concerns, this EIR does discuss possible reinforcement strategies in the Alternatives Section (page 31). The City Planning Commission (or the Board of Supervisors on appeal) will decide whether to approve or disapprove the proposed project, including removal of the smokestack, after review and certification of the EIR. Decision makers may also make use of other information in the public record, such as cost estimates associated with each reinforcement strategy and with the proposed project.

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<sup>1</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1903-1904, San Francisco, Appendix p. 645. The height given in this historical description of the smokestack is considered to be the best available information and is therefore used in this document in place of the estimated height cited in the Initial Study (Appendix A).

C. Main Environmental Effects

*Historic Architectural Resources*

The proposed project would involve physical changes to a building which contributes to the significance of a locally designated historic district and which has consistently been identified in historic architectural resources surveys of the area.

Because the smokestack proposed for removal is one of the most dominant features of the subject building, its removal could affect the building's "contributory" status within the South End Historic District. Also, because the smoke stack is a prominent feature of the South End Historic District, its removal would be considered an adverse change to the Historic District.

The proposed parapet strengthening would involve minor changes to the building, most of which would not be visible from the street, and would not constitute an adverse change to the building or to the district.

Neither removal of the smoke stack nor parapet reinforcement would be likely to affect the overall significance of the South End Historic District, even when combined with other physical changes that have taken place in the District since its designation in 1990. Any official determination regarding a change of status for the District would be the responsibility of the Board of Supervisors, following review and recommendations by the City Planning Commission and the Landmarks Preservation Advisory Board.

*Dust Generation and Hazardous Materials*

The proposed project would remove a large brick smokestack that was in use from 1888 to 1905 or 1906 as part of a plant which generated electricity by burning coal.

Analytical testing of samples from the interior walls of the smokestack did not show metals in excess of the total threshold limit concentration (TTLC) based on criteria pursuant to California Code of Regulations, Title 26, Section 22-66261.24, and did not contain total oil and grease (TOG) above the laboratory detection limit. Three metals (chromium, selenium, and thallium) were reported in concentrations similar to the soluble threshold limit concentrations (STLC) for these metals.<sup>2</sup>

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<sup>2</sup>R. Curtis Payton, R.G. and Douglas T. Young, R.G., Kleinfelder, Inc., Letter to Mr. Mark Mathisen, dated January 19, 1995, pp. 2-3. The letter goes on to say: "Kleinfelder does not expect that the masonry generated from demolition of the smokestack will require special handling or disposal in order to mitigate potential effects on human health or the environment. Nevertheless, prospective disposal facilities may require a waste extraction test (WET) of the masonry to assess whether the leachate from the masonry could produce metals or other compounds in excess of the STLC. If a WET on the masonry material produces metals or other compounds in excess of the

## I. Summary

Tests performed on samples of the ash at the base of the smokestack (inside) found high levels of TOG and various levels of volatile organic compounds such as benzene, toluene, xylenes, and butylbenzylphthalate. Metals were found in excess of ten times the STLC.<sup>3</sup>

Based on these findings, hazardous material in the ash at the base of the smokestack could pose a hazard to construction workers and members of the public in the vicinity of the smokestack during demolition. As a result, the project sponsor has agreed to remove and dispose of the ash prior to demolition, and to implement health and safety measures during its removal. (See mitigation measures, below.)

Following removal of the ash, which is estimated at a total quantity of about two 55-gallon drums, demolition of the smokestack would be accomplished by scaffolding the exterior of the smokestack, and knocking pieces of masonry into the stack. Periodically, debris would be extracted from the base of the stack and removed for disposal off site. This demolition method would limit the amount of dust generated and the potential for falling debris. The demolition contractor would follow standard Occupational Health and Safety Agency (OSHA) practices for construction activities.<sup>4</sup>

### D. Mitigation Measures

#### *Measures Proposed as Part of the Project*

As described above, hazardous materials in the ash at the base of the smokestack could pose a hazard to construction workers and members of the public in the vicinity of the smokestack during demolition. As a result, the project sponsor has agreed to implement the following measure:

#### 1. Removal and Disposal of Hazardous Materials

To eliminate potential health effects related to hazardous materials in the ash at the base of the smokestack, the project sponsor would retain the services of

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STLC, then the masonry would require disposal at a landfill other than a class three facility." A copy of this letter is available for review in the project case file at the Planning Department, 1660 Mission Street.

<sup>3</sup>Ibid. pp. 2-3.

<sup>4</sup>R. Curtis Payton, R.G. and Douglas T. Young, R.G., Kleinfelder, Inc., Letter to Mr. Mathisen dated February 7, 1995., p. 1. and

Steve Aman, Aman Construction, Cited in a Memorandum from Stu During to Hillary Gitelman dated February 6, 1995, pp. 1-2 Copies of this letter and memo are available for public review in the project case file at the Planning Department, 1660 Mission Street.



## I. Summary

qualified persons to remediate the interior of the base of the smokestack through removal and disposal of the ash, and to develop and implement specific safety measures during remediation. Removal of the ash would likely be accomplished with hand shovels and 55-gallon drums. Safety measures would likely include personal protective equipment requirements, an on-site health and safety officer, site control measures, and emergency procedures.<sup>5</sup>

All of these activities would occur prior to demolition of any portions of the smokestack, and would result in two letter-reports. The first letter-report, to be submitted to the Planning Department and the City's Department of Public Health prior to remediation, would specify the safety measures to be implemented and the landfill site to be used. The second letter-report, to be submitted to the Planning Department and the Department of Public Health following remediation, would describe the removal and disposal process, and the resulting conditions within the interior of the smokestack at the end of remediation. The Planning Department's approval of the sponsor's application for a permit to remove the smokestack would be contingent on the Department's receipt of both letter-reports.

### *Additional Measures that Could be Adopted to Minimize Significant Impacts of the Project*

As described above, the proposed project would alter a significant historic architectural resource (the South End Historic District) and could affect the subject building's "contributory" status within the District. While there would be no way to eliminate this impact short of selecting an alternative to the project, there are several ways in which the impact could be minimized. These measures could be required by project decision makers.

#### 2. Photo-document the Subject Building and District Prior to Project Implementation

To document the building and vicinity prior to project implementation, the project sponsor could prepare historic documentation, to Historic American Building Survey (HABS) recordation standards, of the subject building and its setting in the South End Historic District. HABS, which is administered by the National Park Service, is a process involving preparation of written historic and photographic records of a structure to be altered. Any documentation prepared should be transmitted to the San Francisco Main Library and to the Secretary of the City's Landmarks Preservation Advisory Board.

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<sup>5</sup>This mitigation measure was developed in consultation with staff of Kleinfelder, Inc., and is based on the letter cited above.

## I. Summary

### 3. Memorialize the Smokestack Following its Removal

To promote public understanding of the South End Historic District and the history of the subject building, the project sponsor could erect a plaque and/or other monument memorializing the smokestack and its role in the District's history. A plaque could be mounted on the front of the building to provide pedestrians with both a photographic image of the building prior to the smokestack's removal, and information about the history of the building and the Historic District. A rooftop monument such as slender pole or a beam of light marking the smokestack's original location could also be installed. Design and placement of any plaque or monument should be reviewed and approved by the Secretary of the City's Landmarks Preservation Advisory Board.

## E. Alternatives to the Proposed Project

### 1. The No Project or "Do Nothing" Alternative

This alternative would perpetuate existing conditions. The subject building would remain in its current condition, parapets would not be reinforced, and the smoke stack would not be removed. If the No Project Alternative were implemented, no impacts of the project would occur.

### 2. The Preservation Alternative: Reinforce and Retain the Smokestack

This alternative would reinforce building parapets and would reinforce and retain the smokestack. Several alternative methods of strengthening the smokestack have been investigated. These include reinforcement from the inside by using steel, epoxy, and concrete, reinforcement from the outside using a grill-like structure of steel members, and reinforcement from the outside by applying a fiberglass coating. One or more of these methods could be used to reinforce and preserve the smokestack to its full height.

This alternative would reduce or eliminate the significant impact associated with removal of the smokestack. Impacts would depend on the reinforcement method selected, as follows: (1) use of an internal structure that would only be visible in the form of anchor bolts on the smokestack exterior would eliminate the significant impact; (2) use of an external steel grill-like structure that would be visible on the smokestack exterior would reduce or eliminate the significant impact; and (3) use of an external coating which would be visible on the exterior of the smokestack would reduce or eliminate the significant impact. (For more detail, see the Alternatives Section, page 31.)

## I. Summary

Other impacts, such as those related to hazardous materials at the base of the smokestack, would be similar to those associated with the proposed project. Remediation of hazardous materials could possibly be delayed (but not avoided) if access to the base of the smokestack was eliminated and demolition were not to take place.

Alternatives that would reinforce and retain a portion of the smokestack were considered for inclusion in this EIR, but were rejected because they would neither eliminate nor minimize the potentially significant environmental effect associated with removal of the entire smokestack. In other words, if 25%, 50%, or even 75% of the smokestack were left standing, the project would change the overall size and proportionality of the smokestack and would still constitute an adverse change to the subject building and the Historic District.



## II. PROJECT DESCRIPTION

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### A. Site Location and Project Characteristics

The proposed project would reinforce parapets and remove an approximately 120-foot tall brick smokestack associated with the building at 166-78 Townsend Street, which is a contributing building within the locally designated South End Historic District. (See map of site, vicinity, and region, page eight.) Based on historical information, the smokestack has been estimated as 150 feet tall, rising about 120 feet above the height of the building roof.<sup>6</sup> The proposed project would remove the existing smokestack to just above the surface of the roof, and would cap-off the opening with a weather-tight insert. No change of use or occupancy is proposed as part of the current project.

The subject building is a large, one-story brick building of about 20,000 square feet. About 275 feet long, and 80 feet wide, the building occupies the entirety of Assessor's Block 3788, Lot 12, and has a gable roof with stepped gable-ends facing Townsend Street and a narrow alley which extends from Third Street to mid-block. Low brick parapets surround the entire roof of the building. The rear 120 feet of the building is approximately eight or ten feet taller than the front portion of the building. The building is immediately adjacent to Clarence Place, and currently houses West Winds Ship Repair.

The most dominant feature of the building is its smokestack, which is located at the rear of the building. Octagonal in plan, the smokestack is approximately 15-feet in diameter at its base, and tapers to an ornamented flue, about 10-feet in diameter. The smokestack's wall thickness has been estimated as 24-inches at the base of the smokestack, and 18-inches at its top. A piece of wall at the very top of the smokestack has been removed, and a vertically oriented crack on the smokestack's outer surface extends about 25 to 30% of its height.<sup>7</sup> (See photographs of the building and smokestack, pp. 9-10.)

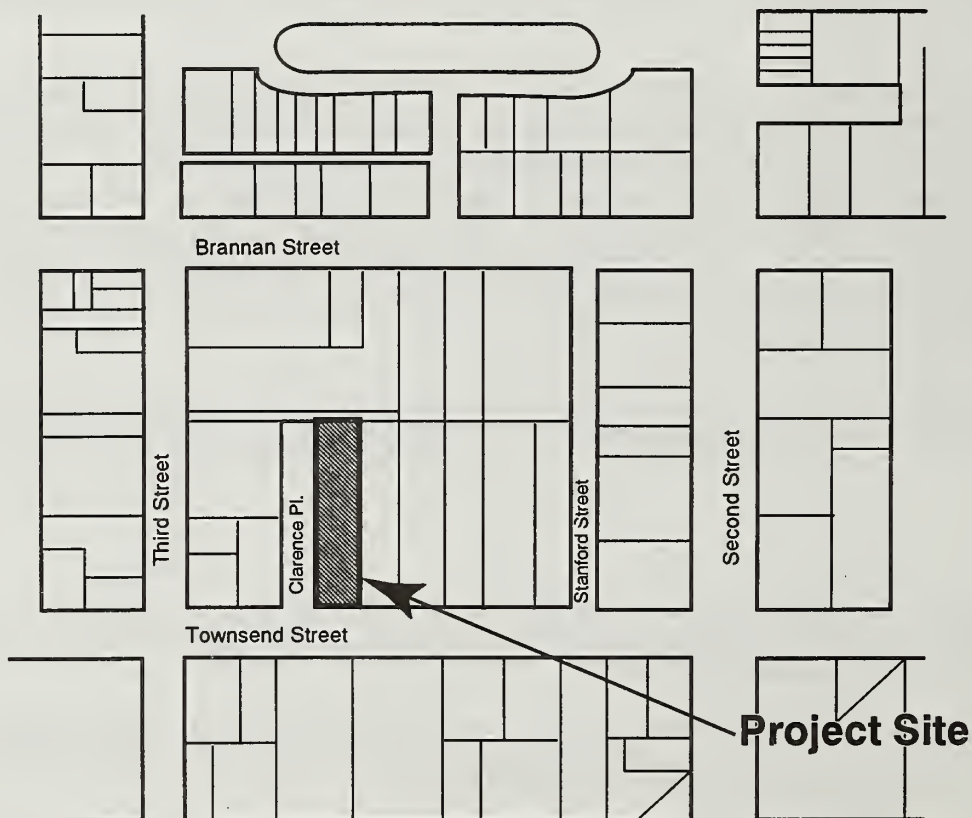
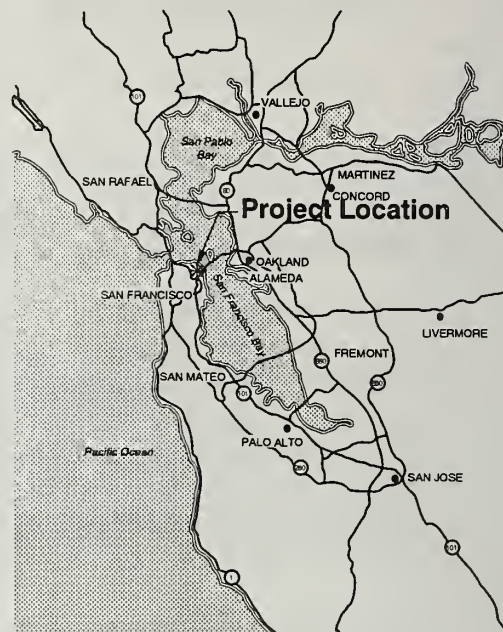
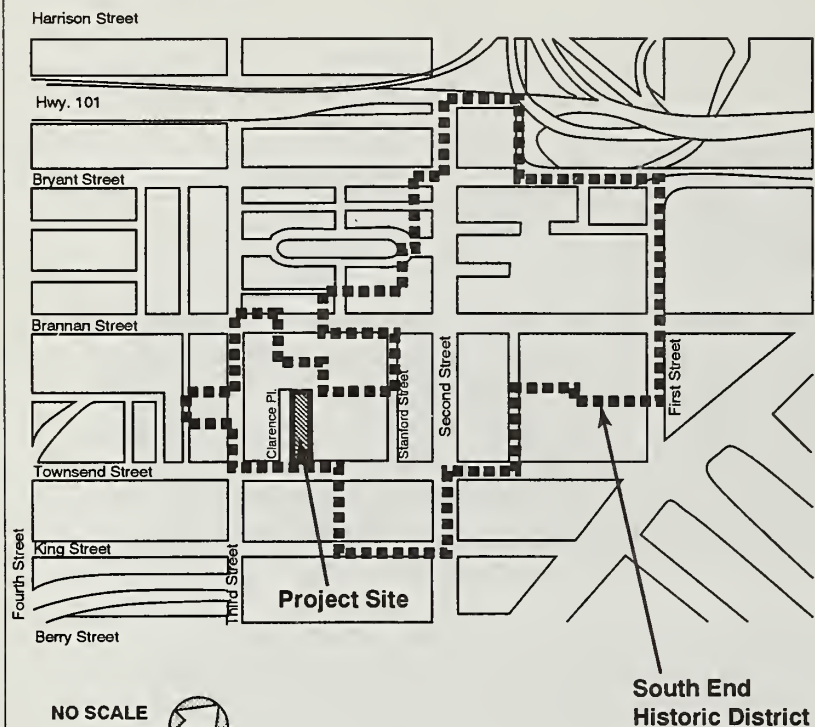
The method that would be used to remove the smokestack would involve erecting scaffolding around the smokestack to its full height and removing the bricks from the top

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<sup>6</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1903-1904, San Francisco, Appendix p. 645. The height cited in this historical source has been used throughout this document and replaces earlier estimates cited in the Initial Study (Appendix A).

<sup>7</sup>Wall thickness estimates and crack description are from Eric Elsesser, Forell/Elsesser Engineers, Inc., Letter to Mr. Mark Mathisen, August 11, 1994, p. 1. A copy of this letter is available for public review in the project case file at the Department of City Planning, 1660 Mission Street.

# Figure 1 Location Map



SOURCE: DURING ASSOCIATES

NO SCALE

Figure One: Map of the Project Site and Vicinity

**Figure 2**

**Photograph Looking Southeast, Showing the Rear of the Subject Building and Smokestack**



SOURCES: NEIL HART; DURING ASSOCIATES



**Figure 3**  
**Photograph Looking Northeast, Showing the Front of the Subject Building and Smokestack**



SOURCES: NEIL HART; DURING ASSOCIATES

## **II. Project Description**

down. Bricks would be allowed to fall into the smoke stack itself, and would periodically be retrieved for off-site disposal.<sup>8</sup>

The proposed project would also reinforce most of the subject building's existing brick parapets, with the exception of portions along the east and west sides of the building. Following construction, the parapet reinforcement would be visible from the street, primarily in the form of metal bolt-plates and horizontal bands of angle iron. Some diagonal bracing behind the parapets could be visible towards the top of the gable from certain angles.

### **B. Project Sponsor's Objectives**

The project sponsor's objectives are to preserve the subject building to the extent feasible; to conform with requirements of the City's Parapet Safety Program; to make safety improvements necessary to maintain insurance coverage of the subject building; and to provide a safe environment in and around the building to allow for its continued use and occupancy.

### **C. Project Approval Requirements and Master Plan Policies**

This EIR will undergo a public comment period as noted on the cover, including a public hearing before the City Planning Commission on the Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Draft Summary of Comments and Responses document. The EIR will be revised as appropriate and presented to the City Planning Commission for certification as to accuracy, objectivity, and completeness. Certification of the EIR may be appealed to the Board of Supervisors. No approvals or permits may be issued before the Final EIR is certified.

The proposed project would require a building permit from the City's Bureau of Building Inspection. In addition to a building permit, the proposed project would require approval of a Certificate of Appropriateness by the City Planning Commission for alterations to a building within the South End Historic District. Characteristics of the District, and procedures and standards relative to Certificates of Appropriateness are contained in Article 10 of the City Planning Code, which also calls for review of the sponsor's application for a Certificate of Appropriateness by the Landmarks Preservation Advisory

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<sup>8</sup>Steve Aman, Aman Construction, in a Memorandum from Stu During to Hillary Gitelman dated February 6, 1995, p. 1. A copy of this memo is available for public review in the project case file at the Planning Department, 1660 Mission Street.

## II. Project Description

Board prior to consideration by the Planning Commission. The decision to approve or disapprove a Certificate of Appropriateness for proposed project would consider standards including whether the proposed project would be "compatible with the character of the historic district as described in the designating ordinance," and whether "reasonable efforts have been made to preserve, enhance or restore, and not to damage or destroy the exterior architectural features of the subject property which are compatible with the character of the historic district."<sup>9</sup>

The EIR would be available to the Landmarks Preservation Advisory Board, and would be used by the City Planning Commission in making its decision on the Certificate of Appropriateness. If the Planning Commission's decision were appealed to the Board of Supervisors, the Board would also use the EIR.

As proposed, the project would have a significant effect on the environment which could not be avoided if the project were implemented. (See Chapter VI, p. 27.) For this reason, project decision makers would have to disapprove the project or, in order to approve the project, would have to find that substantial mitigation measures and project alternatives are infeasible and that the project's significant effects would be acceptable due to specified overriding considerations. In this way, the City Planning Commission (or the Board of Supervisors on appeal) would use the EIR in its decision-making.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood- serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, in its decision regarding the Certificate of Appropriateness would make a determination of the project's conformance with the Priority Policies.

The City's Master Plan provides general policies and objectives to guide land use decisions, and contains some policies which relate to physical environmental issues. The proposed project would be reviewed by the City Planning Commission in the

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<sup>9</sup>San Francisco Department of City Planning, City Planning Code, Article 10, Section 1006.7.



## II. Project Description

context of applicable objectives and policies of the San Francisco Master Plan. Some of the key objectives and policies are noted here.

### Urban Design Element

- o Objective 2, Policy 4, to "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development."
- o Objective 2, Policy 7, to "Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character."

### Community Safety Element

- o Objective 1, to "Reduce hazards to life safety, minimize property damage and economic dislocations resulting from future earthquakes."
- o Objective 1, Policy 2, to "Initiate orderly abatement of hazards from existing buildings and structures."
- o Objective 2, to "Preserve, consistent with life safety considerations, the architectural character of buildings and structures important to the unique visual impact of San Francisco."

### South of Market Element

- o Objective 7, Policy 2, to "Preserve the architectural character and identity of South of Market residential and commercial/industrial buildings."
- o Objective 7, Policy 4, to "Preserve individual architecturally and/or historically significant buildings which contribute to the area's identity, give visual orientation, and which impart a sense of continuity with San Francisco's past."
- o Objective 7, Policy 5, to "Provide incentives for preservation of landmark quality buildings and contributory buildings in historic districts."



### III. ENVIRONMENTAL SETTING

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#### A. Zoning and Land Use

The proposed project site lies within the SLI (Service/Light Industrial) mixed use zoning district, which allows a variety of residential, commercial, and light industrial uses. The site is also within a 50-X height and bulk district, which limits the height of new construction to 50 feet, and within the South End Historic District which requires that specific procedures be followed prior to any new construction, demolition, or building alterations.

Similar to other buildings in the vicinity, the subject building is an industrial building made of brick; its smokestack, which rises about 120 feet above the roof of the rear portion of the building, is visible from many areas of City including the waterfront and parts of the Bay Bridge. The subject building contains approximately 20,000 sq. ft on one level, and is currently used for ship repair and other similar, light industrial uses. Other existing land uses in the vicinity include light industrial uses, retail uses, and some office and residential uses. The subject building occupies 100% of the subject lot, which fronts onto Townsend Street just east of its intersection with Third Street. One side of project site faces a three-story brick building across a narrow public right-of-way (Clarence Place), and the other side abuts a two-story building. Both appear to be occupied by a variety of commercial and light industrial uses. A privately-owned alley is located at the rear of the site, and provides access to an adjacent vacant site that is currently used as a parking lot. (See area map, page eight.)

#### B. Historic Architectural Resources

##### *The Subject Building and Electric Utilities in San Francisco 1879-1906*

According to municipal records, the "first electric light in actual use" in San Francisco was in September 1879, and followed a demonstration given by the Reverend Joseph M. Neri in 1874 from the roof of St. Ignatius College on Market Street, and an exhibition in the Mechanics Pavilion in 1878.<sup>10</sup> What constituted this first "actual use" is unknown, but it is clear that a dramatic period in the history of private utility companies in San Francisco was ushered in with founding of the *California Electric Light Company* in 1879. Marked by business competition, mergers and acquisitions, this period, which ended in 1906 when the regional California Gas and Electric Company merged with the local San Francisco Gas and Electric Company to form the Pacific Gas and Electric Company, was also characterized by a growing public understanding of electricity and

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<sup>10</sup>San Francisco Board of Supervisors, Municipal Reports, Fiscal Year 1896-97, San Francisco, Appendix pp. 374-75.

### III. Environmental Setting

its appropriate public uses, and by development of new electric works and production facilities in San Francisco.

The precise activities of the California Electric Light Company in the few years immediately after its founding in 1879 are largely unknown, although it did apparently commence generating electricity for consumers immediately. The first electric street light was erected by the Company opposite the New City Hall in July of 1883, just less than one year after Thomas Edison successfully lit the Pearl Street District in lower Manhattan. Similar to the way the City contracted for gas street lighting, the City contracted with the California Electric Light Company to erect and maintain the new electric street light for a specified period and, in subsequent years, entered into a succession of two-year contracts with the Company to provide more lights at additional locations. In each case, the contracts were to light "outlying districts" with electric lights, and were executed at the same time as contracts awarded to the San Francisco Gas Light Company for lighting public streets with gas.

Contract specifications generally called for electric street lights to provide 2,000 candle power lamps on 40-foot high masts, although they also called for a few with 16,000 candle power lamps on 150-foot tall masts.<sup>11</sup> By 1891-92, "outlying districts" included squares and parks throughout the City, and by 1892-93, electric lights were placed along many important roads and at important intersections.<sup>12</sup> Lighting of public buildings with electric lights was first discussed in 1893-94 and authorized in 1896, when the California Electric Light Company's successor, the Edison Light and Power Company, received a two-year contract to light the New City Hall and two fire stations in downtown.<sup>13</sup> Meanwhile, the public's appetite for electric street lights continued to grow, and in 1897-98, an association of merchants petitioned the Board of Supervisors for more such lights. In 1898-99, gas lamps were discontinued in some locations for the first time, due to the provision of electric lights in close proximity.<sup>14</sup>

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<sup>11</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1887-88, San Francisco, Appendix pp. 116-18.

<sup>12</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1891-92, San Francisco, Appendix pp.355-57. and San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1893-94, San Francisco, Appendix p. 216.

<sup>13</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1895-96, San Francisco, Appendix p. 215.

<sup>14</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1897-98, San Francisco, Appendix p. 244. and San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1898-99, San Francisco, Appendix p. 174.



### III. Environmental Setting

While large gas works were familiar industrial fixtures of the late nineteenth century city, electric works were not, and the development of the California Electric Light Company's plant at 166-78 Townsend Street in 1888 was one of the first such endeavors. The Company's offices were located on Stevenson Street, between Third and Fourth Streets, and it was from this address that the Company managed its business, publishing advertisements in local papers such as:

"The California Electric Light Company is now prepared to furnish electric motors, from one horse power up to 100 horse power, in any part of the City. This power is available for printing presses, manufactories, operating pumps, for elevators, and, in fact, for any purpose which power may be used. No fireman or engineer needed. Absolute immunity from coal dust, boiler explosion, fire risk and other nuisances of steam plant. No noise or bad smell, as with gas engines. Occupies small space. No investment to user, as the Company furnishes motor and attendance. Parties contracting with this Company can rely upon regular service as it has 1500 horse power that is used only at night, and is therefore a reserve for day service."<sup>15</sup>

The Townsend Street plant, designed by Percy & Hamilton, Architects, was constructed in 1888 as a three story brick building, with a tall, one story annex at the rear. The main building was 52 feet high, while the rear portion was 38 feet high. The entire complex was 80 feet wide along Townsend Street, and 275 feet deep along Clarence Place, with a ground floor area of 22,000 square feet, and a substantial concrete foundation. A 150 foot tall brick chimney rose from the rear of the building, and tapered from a base 15 feet in diameter, to a flue 9 foot 8 inches in diameter. The building housed a substantial quantity of equipment, including engines, boilers, dynamos, switch boards, pumps, and condensers. Coal and salt water were critical to the generation process, and in 1888, the San Francisco Board of Supervisors authorized the Company "To lay down and maintain a pipe for the conveyance of salt water from the waters of the Bay, along Third and Townsend Streets to their new works on Clarence Place," along with a return pipe along Townsend Street, and "to erect and maintain thirty steam boilers with corresponding engine power on their premises."<sup>16</sup>

In 1888, the president of the California Electric Light Company was listed as P. B. Cornwall, and the secretary was listed as George H. Roe. The company became the *Edison Light and Power Company* in 1891, with George H. Roe listed as its president. Despite the name change, the office address of the Company remained the same, and it

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<sup>15</sup>San Francisco Chronicle, July 29, 1888, p. 12.

<sup>16</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1896-97, San Francisco, Appendix pp. 374-75.

### III. Environmental Setting

continued to improve and expand its production facilities, as evidenced by an authorization, granted in 1893, to construct an underground "aqueduct" connecting the Townsend Street facility, referred to as "Station B," with "Jesse Street Station C," which was close by the Company's offices on Stevenson Street. Expansion of the industry in San Francisco was not limited to a single company for long, however, and a 1896-97 Assessor's report on mechanical and manufacturing industries within San Francisco found that there were four electric lighting companies, employing a total of 400 men and boys. The companies supplied 90,000 incandescent lights and 3,300 arc lights, and combined to use 35,000 tons of coal annually; they were valued at \$1,000,000. By comparison, there were two gas works in operation in the same years, employing 600 men and valued at \$1,750,000.<sup>17</sup>

The San Francisco Gas Light Company, which held the contract to light City streets for many years was also subject to intense competition in this period, and was either subsumed within or evolved to become the San Francisco Gas and Electric Company by 1897-98. This company's office address was listed as 415 Post Street, as was the Edison Light and Power Company, which also appears to have been subsumed within the larger company by 1898-99, by when the *San Francisco Gas and Electric Company* had become the City's primary supplier of gas and electricity for lighting streets and public buildings.

Starting around 1896-97, when the Board of Supervisors requested City officials to investigate unauthorized poles and wires appearing on City streets, there were growing concerns expressed by the public's political representatives regarding private utility companies in San Francisco, particularly regarding their rates. As a result of these concerns, the City Engineer was required to provide the Board with comparisons between rates charged by San Francisco companies, and rates in a selection of eastern cities.<sup>18</sup> Also, utility companies were required to provide increasing amounts of information regarding their income, expenses, and assets. A 1903-04 appraisal of San Francisco Gas and Electric Company property "in use for electricity" listed seven properties as follows:

1. Portion of 100 Vara Survey Block 373, 155 feet by 300 feet and 80 feet by 275 feet. (Southeast corner of Howard & Fifth Streets)
2. Portion of 50 Vara Block 168, 55 feet by 137 feet six inches and 22 feet 2 inches by 61 feet. (Post Street, off Union Square)

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<sup>17</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1896-97, p. 5.

<sup>18</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1896-97, San Francisco, pp. 361-62 and Appendix pp. 212-15.



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3. Jesse Street Generating Station C (220 Jessie Street -- San Francisco Landmark No. 87, constructed 1881, altered 1883, 1892, 1905)
4. Townsend Street Generating Electric Station B
5. Fern Avenue substation
6. Mina Street substation
7. Pacific Street substation

A detailed inventory of the building, contents, and equipment associated with the Townsend Street plant tallied its appraised value at \$1,066,301.<sup>19</sup>

Two events of 1905-06 brought this period of utility competition and expansion to a close in San Francisco and also changed the physical attributes of the industry. The first event was the incorporation of the Pacific Gas and Electric Company (PG&E) in 1905, and its absorption of the dominant San Francisco utility, the San Francisco Gas and Electric Company, together with the regional giant, California Gas and Electric Corporation, in 1906.<sup>20</sup> The second event was the great earthquake and fire of 1906. As a result of the formation of PG&E and the merger of the predominant local and regional power producers, San Francisco was no longer dependant on locally-generated electricity, and would eventually rely on sources such as hydroelectric power generated at dams in the Sierras, and on production facilities consolidated in one or two locations. This shift in the location of the City's power source meant that San Francisco had to devote fewer large sites to gas and electric works, and implied changes to sites already in use as production facilities. The great earthquake and fire hastened changes to these existing production sites.

*Townsend Street Generating Electric Station B* ceased operation as a production facility in 1905 or 1906 and was partially destroyed by the great fire which followed the 1906 Earthquake. While the rear "annex" portion of the building and the great smokestack seem to have withstood both earthquake and fire, the three-story portion of the building at the front of the site apparently suffered substantial damage and was rebuilt in its current configuration as a one story structure around the time of the earthquake in 1906. Apparently plant equipment was removed, and the plant was used for hay and grain

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<sup>19</sup>San Francisco Board of Supervisors, Municipal Reports Fiscal Year 1903-04, San Francisco, Appendix pp. 617-45.

<sup>20</sup>Thomas P. Hughes, Networks of Power: Electrification in Western Society, Baltimore: Johns Hopkins University Press, 1983, pp. 276-77.

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storage in the years following the earthquake and fire.<sup>21</sup> Subsequent uses have not been researched.

#### *History and Description of the Historic District and Vicinity*

The South Beach area, which lies on the northeast shore of the San Francisco peninsula to the southeast of Rincon Hill, was the site of a Chinese fishing village from around 1853 to 1865. "Steamboat Point" projected out into the Bay between Second and Third Streets, and was the home of shipbuilding and drydock facilities in the same period. With construction of two public works projects, the "Long Bridge" and the "Second Street Cut" in 1865, the southern waterfront of San Francisco was opened up for industrial development.<sup>22</sup>

The Citizens Gas Company's 1865 works was the first large scale plant on fill in the area, and was supplied with coal via new wharves. Trade and commerce accelerated, and the Pacific Mail Steamship Company erected wharves at the foot of Townsend Street in 1867. Warehouses such as the Company's Oriental Warehouse (1867), began to fill the area and were increasingly served by rail lines and rail spurs, some of which extended into buildings like the California Warehouse (1882). Most of the area burned in the fire that followed the 1906 Earthquake, and was rebuilt to serve the same function as the City's warehouse district.<sup>23</sup>

Historic district designation was proposed for the area by the San Francisco Planning Department in a June 1985 document entitled "South of Market Plan: Proposal for Citizen Review," which was developed with the help of inventories prepared by the Foundation for San Francisco's Architectural Heritage (Heritage). Adopted as an element of the San Francisco Master Plan in 1990, the South of Market Plan identified the "Proposed South End Historic District" and stated "This area should be made an Historic District." (Further discussion regarding plan policies and objectives is included on pp. 10-12.)

In 1990, the South End Historic District, encompassing the subject building and buildings in the vicinity of the site, was designated by the San Francisco Board of Supervisors as

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<sup>21</sup>Historical information is based on unpublished materials about the subject building and the South End Historic District in the Landmarks Preservation Advisory Board's files. These files are available for public review by appointment, at the Department of City Planning, 1660 Mission Street.

<sup>22</sup>San Francisco Department of City Planning. Case Report 89.065L prepared prior to designation of the South End Historic District in 1989-90, p. 15. This case report is available for public review at the Department of City Planning, 1660 Mission Street.

<sup>23</sup>Ibid. pp. 17-8 and p. 4.

### III. Environmental Setting

a historic district in accordance with procedures set forth in Article 10 of the City Planning Code. Case Report No. 89.065L, cited in the designating ordinance, identified the subject building as "Contributory" because it dates from the Historic District's period of significance and retains its historic integrity.<sup>24</sup> According to the Case Report, "The South End Historic District consists of 73 Assessor's Lots and adjacent rights-of-way on the southern waterfront. These 73 properties are located on Assessor's Blocks 3764, 3774, 3775, 3787, 3788, 3789, and 3794. The properties face on Bryant, Brannan, Townsend, King, First, Second, Third, Colin P. Kelly, Federal, South Park, and Stanford Streets." About 48 buildings are considered "Contributory."

The District's "period of historical significance, 1867 to 1935, comprises the era during which the waterfront was a vital part of the City's and the Nation's maritime commerce. Only four buildings remain from the nineteenth century, another four extant buildings were constructed during the six year interval preceding the 1906 earthquake. The majority of the buildings were erected between 1906 and 1929, a period during which trade along the waterfront increased dramatically."<sup>25</sup>

According to Appendix I to Article 10 of the City Planning Code, "The development of warehouses over a 120-year period along the southern waterfront provides a benchmark from which to view architectural and technological responses to the rapid changes of growing industrial nation state and city [sic]. The interdependence of architecture and history can be seen from a look at the evolution of warehouse forms along the southern waterfront. Unlike most other areas of the San Francisco waterfront, the South End district contains an extraordinary concentration of buildings from almost every period of San Francisco's maritime history. Several street fronts -- such as Second, Third and Townsend -- are characterized by solid walls of brick and reinforced concrete warehouses. With this harmony of scale and materials, the South End Historic District is clearly a visually recognizable place. . . ." The District is "an important visual landmark for the city as a whole. The large number of intact masonry warehouses which remain to this day are reminders of the maritime and rail activities which helped to make San Francisco a great turn-of-the-century port city. The warehouse district, because of its distinct building forms, is identifiable from many parts of San Francisco and the greater Bay Area."<sup>26</sup>

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<sup>24</sup>Ibid., p. 71. and San Francisco City Planning Code, Appendix I to Article 10, Section 8, p. 358.16.

<sup>25</sup>Ibid.

<sup>26</sup>San Francisco City Planning Code, Appendix I to Article 10, p. 358.12-358.13.



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#### *Historic Architectural Resources Surveys of the Area*

In addition to being a locally designated historic district, the vicinity of the site has been evaluated during a number of architectural and historic architectural resources surveys. These surveys used a variety of criteria and methodologies and resulted in a number of ratings.

The San Francisco Planning Department conducted a citywide inventory of architecturally significant buildings from 1974 to 1976. The inventory assessed the architectural significance of 10,000 surveyed structures citywide from the standpoint of overall design and particular design features. Both contemporary and older buildings were included and each building was numerically rated according to its overall architectural significance. The ratings ranged from a low of "0" to a high of "5." The survey rated many buildings in the vicinity of the subject site, and rated the subject building a "3."

In 1983, an area contiguous to the present South End Historic District was evaluated by staff of the California Department of Transportation (Caltrans) using criteria of the National Register of Historic Places (National Register) as part of an evaluation of the I-280 Transfer Concept Program. Reviewers found that the area, referred to as the "Rincon Point/South Beach Historic Warehouse - Industrial District" appears eligible for listing in the National Register.<sup>27</sup> The State Historic Preservation Officer reviewed and concurred with the 1983 evaluation, however, no official determination regarding the District's eligibility for the National Register has been made, and the District has never formally been listed in the National Register or in the California Register of Historic Resources.

The Foundation for San Francisco's Architectural Heritage (Heritage) has undertaken architectural surveys of many parts of San Francisco including the vicinity of the subject site, which is within the Secondary Survey Areas described in the book Splendid Survivors.<sup>28</sup>

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<sup>27</sup>California Department of Transportation District 4, Environmental Analysis Branch, "Historic Properties Survey Report I-280 Transfer Concept Program," August 1983, n.p.

<sup>28</sup>Charles Hall Page & Associates, Inc., for the Foundation for San Francisco's Architectural Heritage, Splendid Survivors: San Francisco's Downtown Architectural Heritage, San Francisco: California Living Books, 1979.

## IV. ENVIRONMENTAL IMPACTS

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### A. Historic Architectural Resources

In general, substantial adverse changes to significant historic architectural resources are considered significant adverse environmental effects. Given its official status as a locally designated historic district, the significance of the South End Historic District is not in question; nor is the significance of the subject building, which contributes to the District's overall significance. The question considered in this analysis, therefore, is whether the proposed project would cause substantial adverse changes to these recognized resources (i.e. the District and the subject building).

#### *Potential Impacts to the Subject Building*

The proposed project would physically change the subject building in two ways: it would remove the smokestack which rises about 120-feet above the building's roof, and it would reinforce building parapets.

The smoke stack proposed for removal is the most dominant feature of the subject building, and its removal would change the appearance of the building and the vicinity. This visual change would be noticeable to those familiar with the area or familiar with views of the area which include the smokestack.

In addition to causing a visual change, removal of the smoke stack would affect the "integrity" of the historic structure. "Integrity" is a term used to describe the "wholeness" or overall quality of a historic structure, including its location, design, setting, materials, workmanship, feeling, and association.<sup>29</sup> The proposed project would alter the subject building's historic (c. 1888 and 1906) design, and the workmanship required to construct the brick smokestack in 1888 would no longer be in evidence. Most importantly, removal of the smokestack would affect the building's integrity by removing the building feature which most clearly convey's the building's original use as a power plant. At present, the smokestack clearly demonstrates the subject building's association with technological advances in early San Francisco and with the commercial vitality which allowed delivery of large quantities of raw materials to the power plant.

Because removal of the smokestack would affect the subject building's overall "integrity," it could affect the building's "contributory" status within the South End Historic District. "Contributory" buildings are defined as those " which date from the Historic District's

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<sup>29</sup>The concept of "integrity" as it is generally applied to historic architectural resources is best described in National Park Service Bulletin 15, "How to Apply National Register Criteria for Evaluation," June 1, 1982, pp. 35-44.

#### IV. Environmental Impacts

period of significance and retain their historic integrity" and have "the highest importance in maintaining the character of the Historic District."<sup>30</sup>

The proposed parapet strengthening would involve all brick parapets with the exception of portions along the east and west sides of the building. Following construction, the parapet reinforcement would be visible from the street, primarily in the form of metal bolt-plates and horizontal bands of angle iron. Because of the roof-pitch, some diagonal bracing behind the parapets could be visible towards the top of the gable when viewed from certain angles. These changes to the building would constitute minor additions, and would not involve removal of historic fabric, substantial visible changes, or a loss of "integrity."

##### *Potential Impacts to the Historic District*

The smokestack proposed for removal is a prominent feature of the South End Historic District and is visible from many areas of the City. The smokestack is also one of the oldest structures in the District; it is integral to one of only four buildings that pre-date the turn of the century. Clearly the smokestack's removal would affect the overall physical appearance of the South End Historic District, eliminating the 120-foot vertical element from the skyline. This change would probably be noticeable to those most familiar with the appearance and/or history of the area.

Not directly related to the warehousing function which gave the District its distinct character, the smokestack is a vestigial reminder of the subject building's first use as a power plant from 1888 to 1905 or 1906. Following the building's conversion to warehouse use, the smokestack sat idle but remained an integral part of the subject building and provided physical evidence of functional and technological changes, and demonstrated the "interdependence of architecture and history," as explained in the Case Report cited above.

While an important visual element, and an old element of the District, the smokestack is only one of many features that give the area its character and lend it significance. For this reason, neither removal of the smoke stack nor parapet reinforcement would be likely to affect the overall significance of the historic district. Any official determination regarding a change of status for the district would be the responsibility of the Board of Supervisors, following review and recommendations by the City Planning Commission and the Landmarks Preservation Advisory Board.

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<sup>30</sup>San Francisco City Planning Code, Appendix I to Article 10, p. 358.16.



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### *Potential Cumulative Impacts*

The proposed project would result in a cumulative impact if, when combined with other physical changes that have taken place in the South End Historic District since its designation in 1990, the project would have a greater potential to affect the overall significance of the Historic District than if the project was considered singly.

Including the proposed project, there have been nine (past or reasonably foreseeable future) development projects in the District since its designation that have required Certificates of Appropriateness from the City Planning Commission following review and recommendations from the City's Landmarks Preservation Advisory Board. These projects are listed below, along with their status.

**Table One**  
**Alterations Requiring Certificates of Appropriateness**  
**Within the South End Historic District 1990-1994**

<u>Appl. Number</u>	<u>Location (Block/Lot)</u>	<u>Description</u>	<u>Status of Application</u>
90.830A	3764/070	new construction	approved
91.295A	3789/008	exterior alteration/change of use	approved
92.480A	3788/006	seismic upgrade of pump station/ convert to fire station	approved
92.567A	3774/048	convert existing building to live/work	approved
94.265A	3788/012	remove smokestack/strengthen parapets	pending
94.472A	3794/010	add windows to secondary facade	approved
95.075A	3788/018	new construction	pending

In addition, there have been some changes to portions of the District within the Rincon Point/South Beach Redevelopment Area that have not required Certificates of Appropriateness from the City Planning Commission. In these cases, including a current proposal to convert the Oriental Warehouse to residential condominiums, the City's Landmarks Preservation Advisory Board has made recommendations to the Redevelopment Commission. Finally, a fire in 1994 damaged portions of the Oriental Warehouse, a contributing building within the District, located on Assessor's Block 3789, Lot 15p (650 First Street).

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Of all these projects, only the proposed project, the Oriental Warehouse fire, and the projects within the Redevelopment Area did not gain City Planning Commission approval, together with a finding that no significant impact to the district would occur. None of the changes, either individually or in combination, have been such that the Landmarks Preservation Advisory Board has questioned the overall significance of the District. Existing review procedures including the Certificate of Appropriateness Process, and review of projects for consistency with the eight priority Master Plan policies (Prop M) would tend to minimize impacts associated with individual future projects, even when combined.

Potential impacts within the Redevelopment Area were analyzed in the Rincon Point/South Beach Redevelopment Plan EIR (80.267E, certified November 5, 1980) and Supplemental EIR (90.088E, certified August 15, 1991), which are available for review at the Planning Department, 1660 Mission Street. Potential impacts of the City's seismic strengthening program were analyzed in the Earthquake Hazard Reduction in Unreinforced Masonry Buildings Program Alternatives EIR (89.122E, certified July 11, 1991) which is also available for review at the Planning Department, 1660 Mission Street.

### B. Dust Generation and Hazardous Materials

The proposed project would remove a large brick smokestack that was in use from 1888 to 1905 as part of a plant which generated electricity by burning coal. Because removal of the smokestack could release dust and debris into the immediate vicinity, and because pieces of the smokestack would most likely have to be transported and disposed off site, the interior of the smokestack was tested for potentially hazardous materials.

As shown in Table Two, page 24, test results for samples taken from the interior wall of the smokestack did not contain metals in excess of the total threshold limit concentration (TTLC) based on criteria pursuant to California Code of Regulations, Title 26, Section 22-66261.24, and did not contain total oil and grease (TOG) above the laboratory detection limit. Three metals (chromium, selenium, and thallium) were reported in concentrations similar to the soluble threshold limit concentrations (STLC) for these metals.<sup>31</sup>

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<sup>31</sup>R. Curtis Payton, R.G. and Douglas T. Young, R.G., Kleinfelder, Inc., Letter to Mr. Mark Mathisen, dated January 19, 1995, pp. 2-3. The letter goes on to say: "Kleinfelder does not expect that the masonry generated from demolition of the smokestack will require special handling or disposal in order to mitigate potential effects on human health or the environment. Nevertheless, prospective disposal facilities may require a waste extraction test (WET) of the masonry to assess whether the leachate from the masonry could produce metals or other compounds in excess of the STLC. If a WET on the masonry material produces metals or other compounds in excess of the

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Tests performed on samples of the ash at the base of the smokestack (inside) found TOG ranging from 11,000 to 13,000 parts per million; toluene ranging from 540 to 690 micrograms per kilogram, total xylenes ranging from 35 to 64 micrograms per kilograms, and butylbenzylphthalate ranging from 220 to 260 milligrams per kilogram. In addition, benzene was reported in one composite sample at 11 micrograms per kilogram. Metals were found in excess of ten times the STLC.<sup>32</sup>

**Table Two**  
**Analytical Results of Sampling Program**

Sample Designation	1A-1B	2A-2B	outer	inner	STLC	TTLc
Analysis						
TOG	11,000	13,000	NA	ND(5)	—	—
benzene	0.011	ND(0.005)	NA	NA	—	—
toluene	0.540	0.690	NA	NA	—	—
total xylenes	0.035	0.064	NA	NA	—	—
butylbenzyl-phthalate	260	220	NA	NA	—	—
antimony	ND(2.5)	ND(2.5)	ND(2.5)	ND(2.5)	15	500
arsenic	ND(2.5)	ND(2.5)	ND(2.5)	ND(2.5)	5	500
barium	4,600	3,500	42	43	100	10,000
beryllium	ND(0.5)	ND(0.5)	ND(0.5)	ND(0.5)	0.75	75
cadmium	16	19	0.67	0.51	1	100
chromium	250	240	13	12	5	2,500
cobalt	32	34	6.2	3.9	80	8,000
copper	1,200	940	11	6.9	25	2,500
lead	920	880	3.6	ND(2.5)	5	1,000
mercury	ND(50)	ND(50)	ND(0.05)	ND(0.05)	0.2	20
molybdenum	30	37	3.8	4.8	350	3,500
nickel	320	180	15	9.4	20	2,000
selenium	41	56	1.8	3.4	1	100
silver	3.2	4.4	ND(0.5)	ND(0.5)	5	500
thallium	84	91	ND(5)	8.1	7	700
vanadium	63	83	10	15	24	2,400
zinc	3,100	2,800	7.1	4.4	250	5,000

Source: Kleinfelder, Inc.

STLC, then the masonry would require disposal at a landfill other than a class three facility." A copy of this letter is available for review in the project case file at the Planning Department, 1660 Mission Street.

<sup>32</sup>Ibid. pp. 2-3.



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Although there are no regulatory standards per se for TOG, toluene, total xylenes, or butyl-benzylphthalate in soil, and the standard for benzene (.5 mgms/liter) is not exceeded by any sample, hazardous materials in the ash at the base of the smokestack could pose a hazard to construction workers and members of the public in the vicinity of the smokestack during demolition. As a result, the project sponsor has agreed to remove and dispose of the ash prior to demolition, and to implement health and safety measures during its removal. (See mitigation measures, p. 27.)

Following removal of the ash, which is estimated at a total quantity of about two 55-gallon drums, demolition of the smokestack would be accomplished by scaffolding the exterior of the smokestack, and knocking pieces of masonry into the stack. Periodically, debris would be extracted from the base of the stack and removed for disposal off site. Because demolition would not require lowering pieces of construction debris down from the scaffolding, this demolition method would limit the potential for falling debris. This demolition method would also limit the amount of dust generated, since ash at the base of the smokestack would be removed prior to demolition, and pieces of the stack would be dropped into the base of the stack. The demolition contractor would follow standard Occupational Health and Safety Agency (OSHA) practices for construction activities.<sup>33</sup>

### C. Growth Inducement

In general, a project would be considered growth inducing if its implementation would encourage population increases and/or new development that might not occur if the project were not approved and implemented. The current proposed project is limited in scope to physical changes on the project site and would not involve any change of use or occupancy. The project would also not change the access to adjacent sites or the development potential or relative attractiveness of adjacent sites. For these reasons, the proposed project would not be considered growth inducing.

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<sup>33</sup>R. Curtis Payton, R.G. and Douglas T. Young, R.G., Kleinfelder, Inc., Letter to Mr. Mathisen dated February 7, 1995, p. 1. and

Steve Aman, Aman Construction, Cited in a Memorandum from Stu During to Hillary Gitelman dated February 6, 1995, pp. 1-2. Copies of this letter and memo are available for public review in the project case file at the Planning Department, 1660 Mission Street.



## **V. Mitigation Measures Proposed to Minimize Significant Impacts of the Project**

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### **A. Measures Proposed as Part of the Project**

As described above, hazardous materials in the ash at the base of the smokestack could pose a hazard to construction workers and members of the public in the vicinity of the smokestack during demolition. As a result, the project sponsor has agreed to implement the following measure:

#### **1. Removal and Disposal of Hazardous Materials**

To eliminate potential health effects related to hazardous materials in the ash at the base of the smokestack, the project sponsor would retain the services of qualified persons to remediate the interior of the base of the smokestack through removal and disposal of the ash, and to develop and implement specific safety measures during remediation. Removal of the ash would likely be accomplished with hand shovels and 55-gallon drums. Safety measures would likely include personal protective equipment requirements, an on-site health and safety officer, site control measures, and emergency procedures.<sup>34</sup>

All of these activities would occur prior to demolition of any portions of the smokestack, and would result in two letter-reports. The first letter-report, to be submitted to the Planning Department and the City's Department of Public Health prior to remediation, would specify the safety measures to be implemented and the landfill site to be used. The second letter-report, to be submitted to the Planning Department and the Department of Public Health following remediation, would describe the removal and disposal process, and the resulting conditions within the interior of the smokestack at the end of remediation. The Planning Department's approval of the sponsor's application for a permit to remove the smokestack would be contingent on the Department's receipt of both letter-reports.

### **B. Additional Measures that Could be Adopted to Minimize Significant Impacts of the Project**

As described above, the proposed project would alter a significant historic architectural resource (the South End Historic District) and could affect the subject building's "contributory" status within the District. While there would be no way to eliminate this impact short of selecting an alternative to the project, there are several ways in which

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<sup>34</sup>This mitigation measure was developed in consultation with staff of Kleinfelder, Inc., and is based on letters to Mr. Mathisen dated January 19, 1995 and February 7, 1995. See Impacts Section for full citations.

the impact could be minimized. These measures could be required by project decision makers.

2. Photo-document the Subject Building and District Prior to Project Implementation

To document the building and vicinity prior to project implementation, the project sponsor could prepare historic documentation, to Historic American Building Survey (HABS) recordation standards, of the subject building and its setting in the South End Historic District. HABS, which is administered by the National Park Service, is a process involving preparation of written historic and photographic records of a structure to be altered. Any documentation prepared should be transmitted to the San Francisco Main Library and to the Secretary of the City's Landmarks Preservation Advisory Board.

3. Memorialize the Smokestack Following its Removal

To promote public understanding of the South End Historic District and the history of the subject building, the project sponsor could erect a plaque and/or other monument memorializing the smokestack and its role in the District's history. A plaque could be mounted on the front of the building to provide pedestrians with both a photographic image of the building prior to the smokestack's removal, and information about the history of the building and the Historic District. A rooftop monument such as slender pole or a beam of light marking the smokestack's original location could also be installed. Design and placement of any plaque or monument should be reviewed and approved by the Secretary of the City's Landmarks Preservation Advisory Board.

## **VI. Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented**

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In accordance with Section 21067 of the California Environmental Quality Act (CEQA) and with Section 15040, 15081, and 15082 of the State CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as described in the Mitigation Section on pp. 25-26.

This chapter is subject to final determination by the City Planning Commission as part of its certification of the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Commission.

The proposed project would involve physical changes to a building which contributes to the significance of a locally designated historic district and which has consistently been identified in historic architectural resources surveys of the area. In general, substantial adverse changes to designated historic architectural resources are considered significant adverse environmental effects.

As described in the Impacts Section on page 20, removal of the smokestack would affect the "integrity" of the subject building, remove the building's most dominant physical feature, and jeopardize the building's "contributory" status in the locally designated South End Historic District. Removal of the smokestack would also remove a character-defining feature of the District itself. For these reasons, removal of the smokestack would be considered a substantial adverse change to the subject building and to the Historic District.





## VII. Alternatives to the Proposed Project

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Project decision-makers could adopt any of the following alternatives, if feasible, instead of approving the proposed project.

### A. The No Project or "Do Nothing" Alternative

This alternative would perpetuate existing conditions. The subject building would remain in its current condition, parapets would not be reinforced, and the smoke stack would not be removed. If the No Project Alternative were implemented, no impacts of the project would occur. Additionally, the building would not comply with the City's Parapet Strengthening Program and, according to the project sponsor, would be difficult or impossible to insure.

### B. The Preservation Alternative: Reinforce and Retain the Smokestack

This alternative would reinforce building parapets and would reinforce and retain the smokestack. Several alternatives methods of strengthening the smokestack were investigated. These include reinforcement from the inside by using steel, epoxy, and concrete, reinforcement from the outside using a grill-like structure of steel members, and reinforcement from the outside by applying a fiberglass coating. One or more of these strengthening techniques could be used to reinforce and preserve the existing smokestack to its full height, subject to approval of the engineering design by the City's Department of Building Inspection.

Impacts of this alternative would depend on the reinforcement method selected, as follows:

#### 1. Internal Structure

One possible method for reinforcing the smokestack would involve using an internal structure. A preliminary design prepared by the project engineer would insert a steel tube with six- to ten-inch thick walls and an outside diameter of 55 to 80 inches into the smokestack, fill the area between the pipe and the interior wall of the smokestack with concrete, and use epoxy anchors inserted from the outside of the smokestack to connect through the smokestack walls and the concrete fill, into the interior pipe. Anchors would be required at every 10 to 15 feet vertically. A pedestal of reinforced

concrete would also be added to supplement/reinforce the smokestack's existing foundation.<sup>35</sup>

The only visible change to the subject building under this alternative would be the introduction of rings of anchor bolts spaced every 10 to 15 feet up the shaft of the smokestack, and the reinforcing members and anchors associated with the proposed parapet strengthening. Because these changes would not substantially change the appearance of the smokestack, the subject building, or the District, this alternative would eliminate the significant impact associated with the proposed project.

### 2. External Structure

Another possible method for reinforcing the smokestack would involve using an "exterior grillage" of structural steel members anchored to the masonry stack and to rock at the base of the smokestack. Existing cracks would be repaired by injecting cement or epoxy grout prior to installation of the grill-work, which would consist of vertical and horizontal members, bolted to each other. Based on preliminary designs, the grill-work would have a horizontal band encircling the smokestack about every ten feet, and would have eight vertical members, one at each corner of the octagonal stack.<sup>36</sup>

Visible changes to the subject building under this alternative would include the introduction of vertical and horizontal steel members on the outside of the smokestack. While this would change the appearance of the smokestack, the subject building, and the District, it would not drastically alter the shape or silhouette of the smokestack, and would reduce or eliminate the significant impact associated with the proposed project.

### 3. External Coating

Another possible method for reinforcing the smokestack would apply a fiberglass coating to the outside of the smokestack. This relatively new product would be applied from the outside, following repair of any existing cracks. As stated by the engineer, "this material is essentially translucent if one layer is used. We anticipate using multiple layers for the lower portion

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<sup>35</sup> John Yadegar, John Yadegar & Associates Consulting Structure Engineers, Letter to Mark Mathisen with "Possible Reinforcement Alternative" diagram dated June 2, 1994, June 13, 1994. A copy of this letter and diagram is available for public review in the project case file at the Planning Department, 1660 Mission Street.

<sup>36</sup> Eric Elsesser, Forell/Elsesser Engineers, Inc. Letter to Mark Mathisen, August 11, 1994. A copy of this letter is available for public review in the project case file at the Department of City Planning, 1660 Mission Street.

## VII. Alternatives

of the structure reducing to a single layer as we progress to the top of the structure." Some foundation reinforcement would also be required.<sup>37</sup>

Visible changes to the subject building under this alternative would include the introduction of a coating which would be translucent towards the top of the smokestack, and colored towards the bottom of the smokestack. While this would change the appearance of the smokestack, the subject building, and the District, it would not drastically alter the shape or silhouette of the smokestack, and would reduce or eliminate the significant impact associated with the proposed project.

Under 1, 2, or 3 above, other impacts, such as those related to hazardous materials, would be similar to those associated with the proposed project. Remediation of hazardous materials at the base of the smokestack could possibly be delayed (but not eliminated), however, if access to the base of the stack was restricted, and if demolition of the smokestack did not occur.

Alternatives that would reinforce and retain a portion of the smokestack were considered for inclusion in this EIR, but were rejected because they would neither eliminate nor minimize the potentially significant environmental effect associated with removal of the entire smokestack. In other words, if 25%, 50%, or even 75% of the smokestack were left standing, the project would change the overall size and proportionality of the smokestack, and the project would still constitute a substantial adverse change to the subject building and the historic district.

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<sup>37</sup>Charles Beauvoir, ICF Kaiser Engineering and Construction Group, Letter to Vincent Marsh, August 24, 1994. A copy of this letter is available for public review in the project case file at the Department of City Planning, 1660 Mission Street.





## VIII. EIR Authors; Organizations and Individuals Consulted

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### EIR Authors

Planning Department, City and County of San Francisco  
1660 Mission Street  
San Francisco, CA 94103  
Environmental Review Officer: Barbara W. Sahm  
EIR Coordinator: Hillary E. Gitelman  
EIR Graphics: During and Associates; Photographs by Neil Hart

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### Project Sponsor

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San Mateo, CA 94403

### Project Engineer

John Yadegar & Associates  
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### Project Attorney

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San Francisco, CA 94109

The decision to prepare an EIR was made on November 18, 1994, on the basis of an Initial Study prepared by the Department of City Planning. On that day, a notice that an EIR would be prepared was published in a newspaper of general circulation and was mailed, along with a copy of the Initial Study, to adjacent property owners and to other interested groups and individuals. The mailing solicited input on the scope of the EIR and requested comments within a 21 day period. On December 7, 1994, at a public hearing, the Landmarks Preservation Advisory Board was asked to comment on the scope of the EIR and on alternatives proposed for analysis. All comments received during this scoping period and at the December 7th hearing were considered during development of the Draft EIR.



## IX. Appendices

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Appendix A. Initial Study and EIR Requirement

Appendix B. Draft EIR Distribution List





**NOTICE THAT AN  
ENVIRONMENTAL IMPACT REPORT  
IS DETERMINED TO BE REQUIRED**

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**Date of this Notice:**

November 18, 1994

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**Lead Agency:** City and County of San Francisco, Planning Department  
1660 Mission Street, San Francisco, CA 94103

**Agency Contact Person:** Hillary Gitelman      **Telephone:** (415) 558-6384

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**Project Title:** 94.265E: 166-78 Townsend Street

**Project Sponsor:** Mark Mathisen

**Project Contact Person:** Stu During

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**Project Address:** 166-78 Townsend Street

**Assessor's Block and Lots:** Block 3788, Lot 12

**City and County:** San Francisco

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**Project Description:** The proposed project would demolish an approximately 90-foot tall brick smoke stack and would reinforce parapets on a building at 166-78 Townsend Street, which is a contributing building within the locally designated South End Historic District. No change of use or occupancy is proposed.

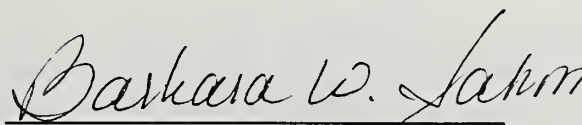
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**THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED.** This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project: see attached.

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**Deadline for Filing of an Appeal of this Determination to the City Planning Commission:** November 28, 1994.

**An appeal requires:** (1) a letter specifying the grounds for the appeal,  
(2) a \$206.00 filing fee.



Barbara W. Sahm  
Environmental Review Officer

**166-78 TOWNSEND STREET  
INITIAL STUDY  
94.265E**

**I. PROJECT DESCRIPTION:**

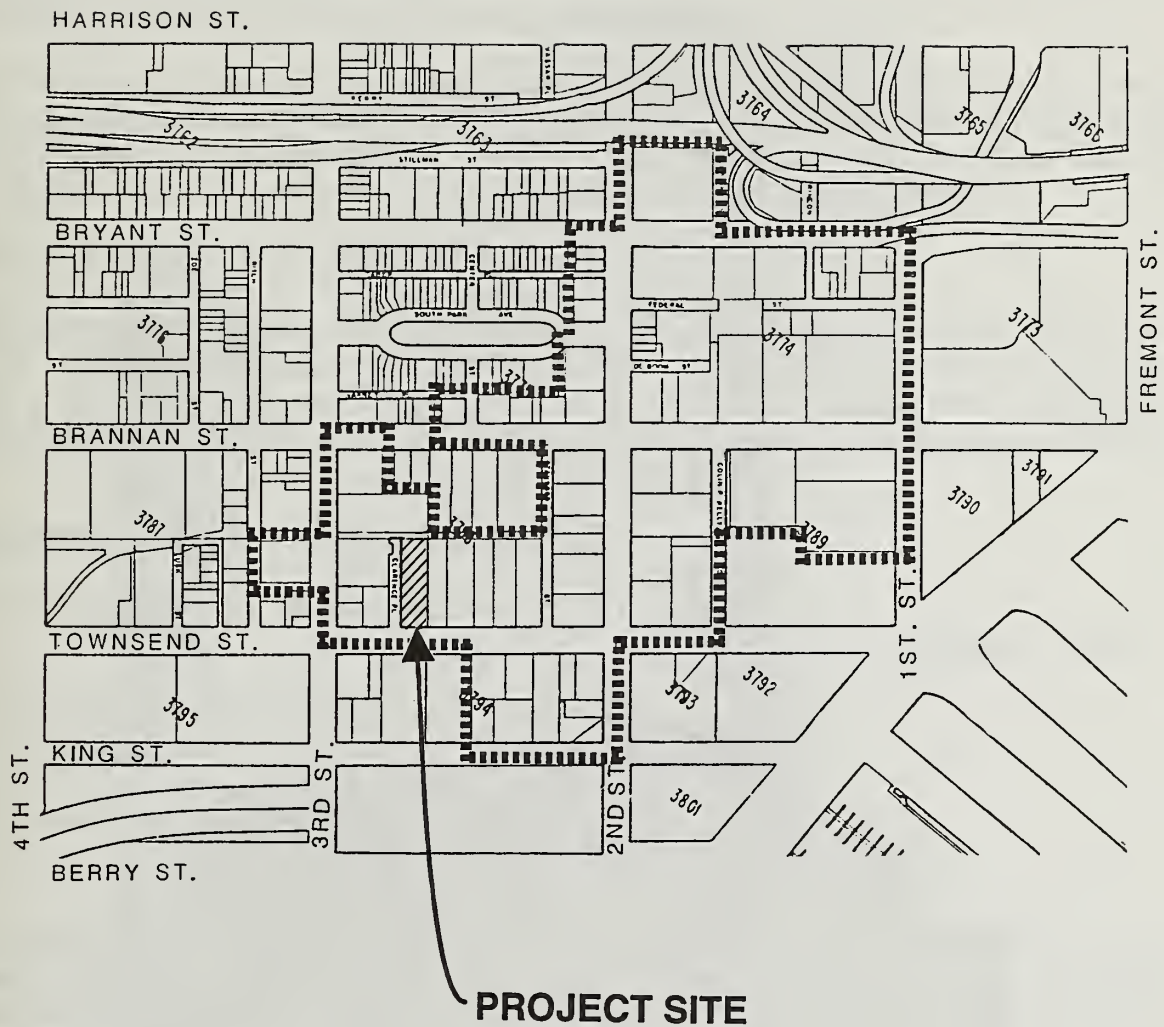
The proposed project would reinforce parapets and remove an approximately 90-foot tall brick smokestack associated with the building at 166-78 Townsend Street, which is a contributing building within the locally designated South End Historic District. (See map of vicinity, page three.) No change of use or occupancy is proposed as part of the current project.

The subject building is a large, one-story brick building of about 20,000 square feet. About 275 feet long, and 80 feet wide, the building occupies the entirety of Assessor's Block 3788, Lot 12, and has a gable roof with stepped gable-ends facing Townsend Street and a narrow alley which extends from Third Street to mid-block. The rear 120 feet of the building is approximately eight feet taller than the front portion of the building. The building is immediately adjacent to Clarence Place, and currently houses automobile repair and related uses. The most dominant feature of the building is its smokestack, which is located at the rear of the building, and extends approximately 90 feet above the roof surface. Octagonal in plan, the smokestack tapers to an ornamented flue, which has been partially removed. Low brick parapets surround the entire roof of the building, stepping-up at the gable ends. (See photograph of smokestack, page four.)

The proposed project would remove the existing smokestack to just above the surface of the roof, and would cap-off the opening with a weather-tight insert. The proposed project would also reinforce most of the existing brick parapets, with the exception of portions along the east and west sides of the building. Following construction, the parapet reinforcement would be visible from the street, primarily in the form of metal bolt-plates and horizontal bands of angle iron. Some diagonal bracing behind the parapets could be visible towards the top of the gable from certain angles. The project sponsor's objectives are to conform with requirements of the City's Parapet Safety Program, and to make improvements necessary to maintain insurance coverage.

The proposed project site is 22,000 square feet, and lies within the SLI (Service/Light Industrial) mixed use zoning district, where automobile-repair and related uses are principal, permitted uses. The site is also within a 50-X height and bulk district, which limits the height of new construction to 50 feet.

Buildings in the vicinity, including the subject building have been consistently identified in architectural and historic resources surveys of the area, and in 1990 were incorporated into a locally designated historic district called the South End Historic District. (See the discussion of historic architectural resources, pp. 10-11, for more information.)



SOURCE: SAN FRANCISCO CITY PLANNING CODE

Figure One: Map of vicinity showing the project site and boundaries of the South End Historic District.





Figure Two: View looking Southeast, showing the rear of the building at 166-78 Townsend Street and the smokestack.



## II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

### A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The 166-78 Townsend Street project is examined in this Initial Study to identify potential effects on the environment. Some potential effects have been determined to be potentially significant, and will be analyzed in an environmental impact report (EIR). These potential effects include effects on historic architectural resources, and effects related to hazardous materials.

### B. EFFECTS FOUND NOT TO BE SIGNIFICANT

Potential effects related to the following environmental issues were determined to be not significant. These items are discussed in Section III below, and require no further environmental analysis in the EIR: land use, visual quality, population, transportation, noise, air quality, utilities/public services, biology, geology/topography, water, energy, and archaeological resources.

## III. ENVIRONMENTAL EVALUATION CHECKLIST

### A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

Discussed      N/A

- |     |   |              |              |
|-----|---|--------------|--------------|
| 1.  | Discuss any variances, special authorizations, changes proposed to the City Planning Code or Zoning Map, if applicable. | <u>  X  </u> | <u>    </u>  |
| 2.* | Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable.        | <u>    </u>  | <u>  X  </u> |

The City Planning Code, which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the Code, or an exception is granted pursuant to provisions of the Code.

The proposed project would require a building permit from the City's Bureau of Building Inspection. In addition to a building permit, the proposed project would require approval of a Certificate of Appropriateness by the City Planning Commission for alterations to a building within the South End Historic District. Characteristics of the District, and procedures and standards relative to Certificates of Appropriateness are contained in Article 10 of the City Planning Code, which also calls for review of the sponsor's application for a Certificate of Appropriateness by the Landmarks Preservation Advisory Board prior to consideration by the Planning Commission.

Environmental plans and policies are those, like the Bay Area Air Quality Plan, which directly address physical environmental issues and/or contain targets or standards which must be met in order to preserve or improve characteristics of the City's physical environment. The current proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy. The City's Master Plan, which provides general policies and

objectives to guide land use decisions, contains some policies which relate to physical environmental issues. The relationship of the proposed project to the policies of the Master Plan will be discussed in the EIR.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a Certificate of Appropriateness for the proposed project, the City Planning Commission is required to find that the proposed project is consistent with the Priority Policies.

## B. ENVIRONMENTAL EFFECTS

### 1. Land Use - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Disrupt or divide the physical arrangement of an established community?	___	<u>X</u>	<u>X</u>
b. Have any substantial impact upon the existing character of the vicinity?	___	<u>X</u>	<u>X</u>

No change of land use would occur as a result of the proposed project, and land use issues such as general neighborhood character will therefore not be discussed in the EIR.

The relationship of the existing building and its smokestack to the historic character of the South End Historic District is referred to on pp. 10-11 below, and will be discussed in the EIR in the context of its analysis of potential impacts to the South End Historic District.

### 2. Visual Quality - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Have a substantial, demonstrable negative aesthetic effect?	___	<u>X</u>	<u>X</u>
b. Substantially degrade or obstruct any scenic view or vista now observed from public areas?	___	<u>X</u>	<u>X</u>
c. Generate obtrusive light or glare substantially impacting other properties?	___	<u>X</u>	___

Removal of the smokestack as proposed (and to a lesser extent, reinforcement of the building's parapets) would constitute a noticeable visual change. While this change might affect the historic character of the district, and would be noticeable to those familiar with the area, it would not result in a substantial demonstrable negative aesthetic affect, and would not degrade or obstruct any scenic view or vista currently observed from public areas. Effects related to visual quality per se will, therefore, not be discussed in the EIR.



The overall physical appearance, or aesthetics, of the South End Historic District is referred to on pp.10-11 below, and will be discussed in the EIR in the context of its analysis of potential impacts to the District due to the visual change proposed.

3. Population - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Induce substantial growth or concentration of population?	___	<u>X</u>	<u>X</u>
b.* Displace a large number of people (involving either housing or employment)?	___	<u>X</u>	___
c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	___	<u>X</u>	___

The proposed project would not change the use or occupancy of the subject building, and could not, therefore, affect the population of the vicinity. Effects related to population will not be discussed in the EIR.

4. Transportation/Circulation - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	___	<u>X</u>	<u>X</u>
b. Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	___	<u>X</u>	<u>X</u>
c. Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	___	<u>X</u>	___
d. Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	___	<u>X</u>	___

The proposed project would not change the use or occupancy of the subject building, and could not, therefore, affect traffic in the vicinity. During demolition of the smokestack and reinforcement of the existing parapets, contractors would come to and from the site, materials would be delivered, and debris would be hauled away from the site. These activities would result in a temporary increase in truck traffic, and on occasion could inconvenience those who normally drive to or through the area, as well as those who park in the immediate vicinity of the subject building. While potentially annoying, this inconvenience would be temporary, and the potential increase in truck traffic would not exceed either the capacity of the surrounding streets, or amounts which are generally accepted in a mixed-use urban area. Transportation issues would not be significant, and therefore will not be discussed in the EIR.

5. Noise - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Increase substantially the ambient noise levels for adjoining areas?	___	<u>X</u>	<u>X</u>
b. Violate Title 24 Noise Insulation Standards, if applicable?	___	<u>X</u>	<u>X</u>
c. Be substantially impacted by existing noise levels?	___	<u>X</u>	___

Project construction could temporarily increase noise levels in the vicinity of the site. Construction noise levels would depend on the equipment in use, the distance between the noise source and listener, and any barriers between the noise source and listener. Contractors would be required to comply with the

City's Noise Ordinance, and noise levels would not be expected to exceed levels commonly accepted in urban areas. Noise effects will not be discussed in the EIR.

6. Air Quality/Climate - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	___	<u>X</u>	<u>X</u>
b.* Expose sensitive receptors to substantial pollutant concentrations?	___	<u>X</u>	___
c. Permeate its vicinity with objectionable odors?	___	<u>X</u>	___
d. Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	___	<u>X</u>	___

The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. These thresholds are based on the minimum size projects which the District considers capable of producing air quality problems. The project would not exceed this minimum standard. Therefore, no significant air quality impacts would be generated by the proposal. Air quality issues will not be discussed in the EIR, except that potential dust-generation during demolition activities will be addressed in the context of hazardous materials. (See pp. 9-10, below.)

7. Utilities/Public Services - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Breach published national, state or local standards relating to solid waste or litter control?	___	<u>X</u>	___
b.* Extend a sewer trunk line with capacity to serve new development?	___	<u>X</u>	___
c. Substantially increase demand for schools, recreation or other public facilities?	___	<u>X</u>	<u>X</u>
d. Require major expansion of power, water, or communications facilities?	___	<u>X</u>	___

No change of use or occupancy is proposed, and the proposed project would, therefore, not increase demand for and use of public services and utilities on the site. Utilities/public services will not be discussed in the EIR.

8. Biology - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Substantially affect a rare or endangered species of animal or plant, or the habitat of the species?	___	<u>X</u>	___
b.* Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	___	<u>X</u>	___
c. Require removal of substantial numbers of mature, scenic trees?	___	<u>X</u>	___

Natural resources issues will not be discussed in the EIR.



9. Geology/Topography - Could the project:

<u>Yes</u>	<u>No</u>	<u>Discussed</u>
___	<u>X</u>	<u>X</u>
___	<u>X</u>	___

- a.\* Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?
- b. Change substantially the topography or any unique geologic or physical features of the site?

The project would not increase the use or occupancy of the site, and would not change soil or site characteristics in any way so as to increase risk or exposure to geologic hazards. Geology/topography will not be discussed in the EIR.

10. Water - Could the project:

<u>Yes</u>	<u>No</u>	<u>Discussed</u>
___	<u>X</u>	___
___	<u>X</u>	___
___	<u>X</u>	___

- a.\* Substantially degrade water quality, or contaminate a public water supply?
- b.\* Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?
- c.\* Cause substantial flooding, erosion or siltation?

Water issues will not be discussed in the EIR.

11. Energy/Natural Resources - Could the project:

<u>Yes</u>	<u>No</u>	<u>Discussed</u>
___	<u>X</u>	<u>X</u>
___	<u>X</u>	___

- a.\* Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?
- b. Have a substantial effect on the potential use, extraction, or depletion of a natural resource?

No change of use or occupancy is proposed as part of the project, and no increase in energy demand would result. Removal of the smokestack and reinforcement of the parapets would require a limited amount of energy. Energy issues will not be discussed in the EIR.

12. Hazards - Could the project:

<u>Yes</u>	<u>No</u>	<u>Discussed</u>
___	<u>X</u>	<u>X</u>
___	<u>X</u>	___
___	<u>X</u>	___

- a.\* Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?
- b.\* Interfere with emergency response plans or emergency evacuation plans?
- c. Create a potentially substantial fire hazard?

Demolition activities within the City and County of San Francisco require a permit from the Bureau of Building Inspection (BBI), which is responsible for implementing sections of the Building Code related to site safety. Contractor licensing requirements, and OSHA requirements also assure that contractors will act in a responsible and safe manner when engaging in demolition or construction activities. The contractor implementing engineering plans for removal of the smokestack would be required to fully protect the subject property and adjacent properties from falling debris, and would be responsible for

conditions of the job site including the safety of persons and property. Also, if deemed necessary by the reviewing engineer at the BBI, Section 306 of the San Francisco Building Code would allow the BBI to require a licensed engineer to be on site as a "Special Inspector" during removal of the smokestack to ensure work was carried out in a safe manner.

At present, information is not available regarding potentially hazardous materials (if any) that may be located within the smokestack proposed for demolition. For this reason, and because any dust or debris within the smokestack could become airborne, or come into contact with construction workers and the public, potential dust generation and potential hazardous materials issues will be discussed in the EIR, when additional information will be available. If hazardous materials are present, mitigation measures will be required to ensure that there would be no significant effect on public health or the environment.

13. Cultural - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
a.* Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community, ethnic or social group; or a paleontological site except as a part of a scientific study?	<u>X</u>	<u>    </u>	<u>X</u>
b. Conflict with established recreational, educational, religious or scientific uses of the area?	<u>    </u>	<u>X</u>	<u>X</u>
c. Conflict with the preservation of buildings subject to the provisions of Article 10 or (proposed) Article 11 of the City Planning Code?	<u>X</u>	<u>    </u>	<u>X</u>

The proposed project would modify a building which contributes to the significance of a locally designated historic district, and which has consistently been identified as significant in historic and architectural resources surveys of the area. Known as the California Electric Light Company Building, the building was constructed in 1888, and was modified slightly, possibly in 1906. The 90-foot tall smokestack (rising about 130 feet from the ground, and about 90 feet from the building roof) itself dates from 1888, and was used until c. 1905, when the building ceased to be used as an electric power plant. From 1908 to 1915, the building was used for hay and grain storage; it is currently used for automobile repairs and related uses.

The building was rated 3 in the Department of City Planning's 1976 Architectural Survey, and rated A by the Foundation for San Francisco's Heritage; it was rated a "contributing building" when the South End Historic District was designated by the San Francisco Board of Supervisors in 1990, and was identified as contributing to a potentially eligible National Register Historic District by staff of the California Department of Transportation (Caltrans) in 1983. (While the State Historic Preservation Officer reviewed Caltrans' findings, no official determination of eligibility for the National Register of Historic Places has ever been made.)

Because the significance of the subject building and the South End Historic District is not in question, the EIR will focus on whether the modifications proposed as part of this project would constitute a substantial adverse change to the building, or to features which help to define its "contributory" status within the historic district. The EIR will also consider whether visual changes resulting from the proposed project would substantially change the character of the historic district, or affect its overall significance.



No subsurface features would be affected, and potential archaeological resources will not be discussed in the EIR.

C. OTHER - Could the project:

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
Require approval of permits from City Departments other than Department of City Planning or Bureau of Building Inspection or from Regional, State or Federal Agencies?	<u>    </u>	<u>  X  </u>	<u>    </u>

D. MITIGATION MEASURES PROPOSED AS PART OF THE PROJECT:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Discussed</u>
1. Could the project have significant effect if mitigation measures are not included in the project?	<u>  X  </u>	<u>    </u>	<u>    </u>	<u>  X  </u>
2. Are all mitigation measures necessary to eliminate significant effects included in the project?	<u>    </u>	<u>  X  </u>	<u>    </u>	<u>  X  </u>

The EIR will contain a mitigation chapter describing measures which would be or could be adopted to reduce potential adverse effects of the project identified in the EIR.

E. ALTERNATIVES

Alternatives to the proposed project will be defined further and described in the EIR. At a minimum, alternatives analyzed will include the following:

1. A No Project Alternative in which the site would remain in its existing condition.
2. A Preservation Alternative which would reinforce and retain the smokestack. Reinforcement techniques that may be discussed include: reinforcement through use of an external grill-like structure, through interior steel and epoxy elements, and through external application of a fiberglass coating.

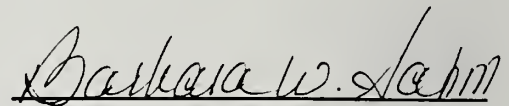
Reinforcement and retention of a portion of the smokestack may also be discussed, depending on comments received during the 21 days following publication of this document.

F. MANDATORY FINDINGS OF SIGNIFICANCE

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
1.* Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?	<u>X</u>	<u>    </u>	<u>X</u>
2.* Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<u>    </u>	<u>X</u>	<u>    </u>
3.* Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)	<u>    </u>	<u>X</u>	<u>    </u>
4.* Would the project cause substantial adverse effects on human beings, either directly or indirectly?	<u>    </u>	<u>X</u>	<u>X</u>

G. ON THE BASIS OF THIS INITIAL STUDY

- I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers     , in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.
- X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



BARBARA W. SAHM  
Environmental  
Review Officer

Date: 11/15/94

for

Lucian R. Blazej  
Director of Planning



## Appendix B. Draft EIR Distribution List

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### FEDERAL AND STATE AGENCIES

Northwest Information Center  
California Archaeological Inventory  
Department of Anthropology  
Sonoma State University  
Rohnert Park, CA 94928  
Attn: Christian Gerike

State Office of Intergovernmental  
Management (10)  
State Clearinghouse  
1400 - Tenth Street  
Sacramento, CA 95814

California Dept. of Transportation  
Transportation Planning  
111 Grand Avenue  
P.O. Box 23660  
Oakland, CA 94623  
Attn:

California Dept. of Transportation  
Public Transportation Branch  
111 Grand Avenue  
P.O. Box 23660  
Oakland, CA 94623  
Attn: William Chastain

### REGIONAL AGENCIES

Association of Bay Area Governments  
P.O. Box 2050  
Oakland, CA 94604  
Attn: Sally Germain

Regional Water Quality Control Board  
2101 Webster Street  
Oakland, CA 94612  
Attn: Steven Hill

### CITY AND COUNTY OF SAN FRANCISCO

Department of Building Inspection  
450 McAllister Street  
San Francisco, CA 94102  
Attn: Frank Chui, Superintendent

Mayor's Office of Community Development  
10 U.N. Plaza  
San Francisco, Ca 94102  
Attn: Larry Del Carlo

Landmarks Preservation Advisory Board  
1660 Mission Street  
San Francisco, CA 94103  
Attn: Vincent Marsh, Secretary  
Patrick McGrew, President  
Betty Smith-Brassington, V. President  
Dr. Harold Kirker  
William Fazande  
Artemis C. Maurille  
Nancy L. Loo  
Sheila Starr  
Proctor Jones

Mayor's Office of Housing  
10 U.N. Plaza  
San Francisco, CA 94102  
Attn: Barbara Smith

J. David Heindel,  
Mayor Office of Economic Planning &  
Development  
Rm. 416, War Memorial Building  
401 Van Ness Ave.  
San Francisco, CA 94102

## Appendix B: Draft EIR Distribution List

Bureau of Energy Conservation  
Hetch Hetchy Water & Power  
1155 Market Street, 4th Floor  
San Francisco, CA 94103  
Attn: John Deakin, Director

Public Utilities Commission  
1155 Market Street  
San Francisco, CA 94102  
Attn: Anson B. Moran, General Manager

Recreation & Park Department  
McLaren Lodge, Golden Gate Park  
Fell and Stanyan Streets  
San Francisco, CA 94117  
Attn: Deborah Lerner

Police Department, Planning Division  
Hall of Justice  
850 Bryant Street  
San Francisco, CA 94103  
Attn: Lt. James Molinari

San Francisco City Planning Commission  
1660 Mission Street  
San Francisco, CA 94103  
Attn: Linda Avery, Secretary  
    Sidney R. Unobskey, President  
    Frank F. Fung, Vice President  
    M. Toby Levine  
    Susan Lowenberg  
    Larry Martin  
    David Prowler, Alternate  
    Roberta Boomer, Alternate

San Francisco Department of Public Works  
Division of Streets and Mapping  
875 Stevenson Street, Room 465  
San Francisco, CA 94103  
Attn: Tim A. Molinare

Division of General Engineering  
45 Hyde Street, Room 200  
San Francisco, CA 94102  
Attn: Raymond Wong

San Francisco Dept. of Parking & Traffic  
Traffic Engineering Division  
25 Van Ness Avenue  
San Francisco, CA 94102  
Attn: Mark Rand

San Francisco Fire Department  
Division of Planning & Research  
260 Golden Gate Avenue  
San Francisco, CA 94102  
Attn: Howard L. Slater

San Francisco Municipal Railway  
MUNI Planning Division  
949 Presidio Avenue, Room 204  
San Francisco, CA 94115  
Attn: Peter Straus

San Francisco Real Estate Department  
25 Van Ness Avenue, 4th floor  
San Francisco, CA 94102  
Attn: Anthony Delucchi, Director

Water Department, Distribution Division  
425 Mason Street  
San Francisco, CA 94102  
Attn: Hans Bruno, Assistant Manager

### GROUPS AND INDIVIDUALS

AIA  
San Francisco Chapter  
130 Sutter Street  
San Francisco, CA 94104

Appendix B: Draft EIR Distribution List

Richard Mayer  
Artists Equity Assn.  
27 Fifth Avenue  
San Francisco, CA 94118

Library  
Bakery & McKenzie  
Two Embarcadero Court  
Suite 2400  
San Francisco, CA 94111

John Bardis  
Sunset Action Committee  
1501 Lincoln Way, #503  
San Francisco, CA 94122

Barkley & Lee  
The Mills Building, Suite 691  
220 Montgomery Street  
San Francisco, CA 94104  
Attn: Alice Suet Yet Barkley

Bay Area Council  
200 Pine Street, Suite 300  
San Francisco, CA 94104-2702

Albert Beck  
Eco/Plan International  
310 B Salem Street  
Chico, CA 95928

Bendix Environmental Research, Inc.  
1390 Market Street, Suite 418  
San Francisco, CA 94102

Anne Bloomfield  
2229 Webster Street  
San Francisco, CA 94115

Breitman Co.  
120 Howard Street, Suite 440  
San Francisco, CA 94105  
Attn: Frank Young

Alice Carey  
Carey & Co., Inc.  
123 Townsend Street, Suite 400  
San Francisco, CA 94107

Michael Dyett  
Blayney-Dyett  
70 Zoe Street  
San Francisco, CA 94103

Georgia Brittan  
870 Market Street, Room 1119  
San Francisco, CA 94102

Brobeck, Phleger, Harrison  
One Market Plaza  
San Francisco, Ca 94105  
Attn: Susan R. Diamond

Cahill Contractors, Inc.  
425 California Street, Suite 2300  
San Francisco, CA 94104  
Attn: Jay Cahill

Chicago Title  
388 Market Street, 13th Floor  
San Francisco, CA 94111  
Attn: Carol Lester

Chickering & Gregory  
615 Battery Street, 6th Floor  
San Francisco, CA 94111  
Attn: Ken Soule

Chinatown Resource Center  
1525 Grant Avenue  
San Francisco, CA 94133

Coalition For San Francisco Neighborhoods  
Mrs. Dorice Murphy  
175 Yukon Street  
San Francisco, CA 94114

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Ms. Berit Costas  
5072 Mauna Lani  
Honolulu, HI 96816

Cushman & Wakefield of California, Inc.  
Bank of America Center  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Attn: Wayne Stiefvater/Lawrence Farrell

Downtown Association  
582 Market Street  
San Francisco, CA 94105  
Attn: Mr. Lee Dolson

EIP Associates  
601 Montgomery Street, Suite 500  
San Francisco, CA 94111  
Attn.: Barbara Phillips

Environmental Science Associates, Inc.  
301 Brannan St., Suite 200  
San Francisco, CA 94107

Fan & Associates  
Architecture & Planning, Inc.  
580 Market Street, Suite 300  
San Francisco, CA 94104  
Attn: Robert Fan

Farella, Braun & Martel  
235 Montgomery Street  
San Francisco, CA 94104  
Attn: Sandra Lambert

Food and Fuel Retailers For Economic  
Equality  
770 L Street, Suite 960  
Sacramento, CA 95814  
Attn: Doug Stevens, State Coordinator

The Foundation for San Francisco's  
Architectural Heritage  
2007 Franklin Street  
San Francisco, CA 94103  
Attn: David Bahlman, Executive Director

Gladstone & Vettel, Attorneys at Law  
177 Post Street, Penthouse  
San Francisco, CA 94108  
Attn: Steven L Vettel

Gensler and Associates  
550 Kearny Street  
San Francisco, CA 94103  
Attn: Peter Gordon

Goldfarb & Lipman  
One Montgomery Street  
West Tower, 23rd Floor  
San Francisco, CA 94104  
Attn: Paula Crow

Greenwood Press, Inc.  
P.O. Box 5007  
Westport, Conn 06881-9900  
Attn: Eric LeStrange

Gruen, Gruen & Associates  
564 Howard Street  
San Francisco, CA 94105

Valerie Hersey  
Munsell Brown  
950 Battery  
San Francisco, CA 94111

Sue Hestor  
Attorney at Law  
870 Market Street, Room 1121  
San Francisco, CA 94102



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The Jefferson Company  
1700 California Street, #470  
San Francisco, CA 94109

Kaplan/McLaughlin/Diaz  
222 Vallejo Street  
San Francisco, CA 94111  
Attn: Jan Vargo

Anne McKnight  
566 Eureka Street  
San Francisco, CA 94114

Larry Mansbach  
595 Market St., Suite 2500  
San Francisco, CA 94105

Cliff Miller  
970 Chestnut Street, #3  
San Francisco, CA 94109

George Miers & Associates  
420 Sutter Street  
San Francisco, CA 94108  
Attn: Marty Zwick

Morrison & Foerster  
345 California Street  
San Francisco, CA 94104  
Attn: Jacob Herber

National Lawyers Guild  
558 Capp Street  
San Francisco, CA 94110  
Attn: Regina Sneed

Nichols-Berman  
142 Minna Street  
San Francisco, CA 94105  
Attn: Louise Nichols

Page & Turnbull  
364 Bush Street  
San Francisco, CA 94104

Perini Corporation  
75 Broadway  
San Francisco, CA 94111  
Attn: Christopher Scales

Pettit & Martin  
101 California Street, 35th Floor  
San Francisco, CA 94114  
Attn: John M. Sanger

Pillsbury, Madison & Sutro  
P.O. Box 7880  
San Francisco, CA 94120  
Attn: Marilyn L. Siems

Planning Analysis & Development  
50 Francisco Street  
San Francisco, CA 94133  
Attn: Gloria Root

Mrs. G. Bland Platt  
362 Ewing Terrace  
San Francisco, CA 94118

Dennis Purcell  
Coblentz, Cahen, McCabe and Breyer  
222 Kearny Street, 7th Floor  
San Francisco, Ca 94108

Ramsay/Bass Interest  
3756 Grant Avenue, Suite 301  
Oakland, CA 94610  
Attn: Peter Bass

Capital Planning Department  
UCSF  
145 Irving Street  
San Francisco, CA 94122  
Attn: Bob Rhine

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David Rhoades & Associates  
400 Montgomery Street, Suite 604  
San Francisco, CA 94104

Herb Lembcke, FAIA  
Rockefeller & Assoc. Realty L.P.  
Four Embarcadero, Suite 2600  
San Francisco, CA 94111-5994

Paul Fisher  
Rincon Tenacious Tenants  
901 Powel Street, #18  
San Francisco, CA 94105

Rothschild & Associates  
244 California Street, Suite 500  
San Francisco, CA 94111  
Attn: Thomas N. Foster

Royal Lepage Commercial Real Estate  
Services  
353 Sacramento Street, Suite 500  
San Francisco, CA 94111  
Attn: Richard Livermore

Royal Title  
1 California Street, Suite 2200  
San Francisco, CA 94111  
Attn: Jim Galvin

San Francisco Beautiful  
41 Sutter Street, #709  
San Francisco, CA 94104  
Attn: Donna Casey, Exec. Director

San Francisco Building & Construction  
Trades Council  
2660 Newhall Street, #116  
San Francisco, CA 94124-2527  
Attn: Stanley Smith

San Francisco Chamber of Commerce  
465 California Street  
San Francisco, CA 94104  
Attn: Richard Morten

San Francisco Labor Council  
510 Harrison Street  
San Francisco, CA 94105-3104  
Attn: Walter Johnson

San Francisco Planning & Urban Research  
Association  
312 Sutter Street  
San Francisco, CA 94108

San Francisco Tomorrow  
54 Mint Street, Room 400  
San Francisco, CA 94103  
Attn: Tony Kilroy

Sierra Club  
730 Polk Street  
San Francisco, CA 94109  
Attn: John Holtzclaw

Sedway Cooke Associates  
300 Montgomery Street, Suite 200  
San Francisco, CA 94104

Shartsis Freise & Ginsburg  
One Maritime Plaza, 18th Floor  
San Francisco, CA 94111  
Attn: Dave Kremer

Skidmore, Owings & Merrill  
333 Bush Street  
San Francisco, CA 94104  
Attn: Jerry Goldberg

Solem & Associates  
545 Mission Street  
San Francisco, CA 94105  
Attn: Olive Lewis

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South of Market Business Assn.  
1459 18th Street, Suite 175  
San Francisco, CA 94107  
Attn: Tricia James

Raymond Colmenar  
South of Market Problem Solving Cncl.  
965 Mission Street, Suite 700  
San Francisco, CA 94103

Square One Film & Video  
725 Filbert Street  
San Francisco, CA 94133

Steefel, Levitt & Weiss  
199 - 1st Street  
San Francisco, CA 94105  
Attn: Robert S. Tandler

Tenants and Owners Development Corp.  
230 - Fourth Street  
San Francisco, CA 94103  
Attn: John Elberling

TRI  
100 Pine Street, Suite 2300  
San Francisco, CA 94111  
Attn: Mathew Cappiello

Jerry Tone  
Montgomery Capital Corp.  
244 California St.  
San Francisco, CA 94111

Joel Ventresca  
202 Grattan  
San Francisco, CA 94117

Jon Twitchell Associates  
143 Connecticut St.  
Francisco, CA 94107

Stephen Weicker  
899 Pine Street, #1610  
San Francisco, CA 94108

Calvin Welch  
Council of Community Housing  
Organizations  
409 Clayton Street  
San Francisco, CA 94117

Whisler-Patri  
2 Bryant Street  
San Francisco, CA 94105  
Attn: Marie Zeller

Eunice Willette  
1323 Gilman Avenue  
San Francisco, CA 94124

Bethea Wilson & Associates Art In  
Architecture  
2028 Scott, Suite 204  
San Francisco, CA 94115

ADJACENT PROPERTY OWNERS

3788-18  
Patrick McNerney & Scott Pelichoff  
665 Third Street, Suite 30  
San Francisco, CA 94107

3788-11A  
D. Vanmeurs  
164 Townsend Street  
San Francisco, CA 94107-1919

3788-12  
Bea Hill Family  
101 Juniper Hill Rd.  
Reno, NV 89509

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3788-13

J. Mariani  
2500 El Camino Real  
Santa Clara, CA 95051-3004

3788-19

625 Third Street Assoc.  
55 Francisco St., 8th Fl.  
San Francisco, CA 94133-2122

3788-24

Harrigan Weidenmuller Co.  
300 Montgomery St, Suite 800  
San Francisco, CA 94104-1910

3788-25

George Lithograph Co.  
650 Second Street  
San Francisco, CA 94107-2015

3788-41

655 Third Street Assoc.  
100 California St. Suite 756  
San Francisco, CA 94111-4512

3794-4

183 Townsend Corp.  
1278 21st Avenue  
San Francisco, CA 94122-1710

3794-6

Grosvenor Third St. Assoc.  
1550 Bryant Street, 6th Floor  
San Francisco, CA 94103-4832

PROJECT SPONSOR

Mark Mathisen  
1601 Oakwood Dr.  
San Mateo, CA 94403

PROJECT ATTORNEY

David P. Cincotta  
1388 Sutter Street, Suite 900  
San Francisco, Ca 94109

MEDIA

Associated Press  
1390 Market Street, Suite 318  
San Francisco, CA 94102  
Attn: Bill Shiffman

San Francisco Bay Guardian  
2700 - Nineteenth Street  
San Francisco, CA 94110  
Attn: Patrick Douglas, City Editor

San Francisco Business Times  
325 - 5th Street  
San Francisco, CA 94107  
Attn: Tim Turner

San Francisco Chronicle  
925 Mission Street  
San Francisco, CA 94103  
Attn: Elliot Diringer

San Francisco Examiner  
P.O. Box 7260  
San Francisco, CA 94120  
Attn: Gerald Adams

The Sun Reporter  
1366 Turk Street  
San Francisco, CA 94115

Tenderloin Times  
146 Leavenworth Street  
San Francisco, CA 94102  
Attn: Rob Waters



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LIBRARIES

Document Library (three copies)  
City Library - Civic Center  
San Francisco, CA 94102  
Attn: Faith Van Liere

Stanford University Libraries  
Jonsson Library of Government Documents  
State & Local Documents Division  
Stanford, CA 94305

Government Publications Department  
San Francisco State University  
1630 Holloway Avenue  
San Francisco, CA 94132

Hastings College of the Law - Library  
200 McAllister Street  
San Francisco, CA 94102-4978

Institute of Government Studies  
109 Moses Hall  
University of California  
Berkeley, CA 94720



Request for Final Environmental Impact Report

TO: Planning Department  
Office of Environmental Review

Please send me a copy of the Final EIR.

Signed: \_\_\_\_\_

Print Your Name and Address Below:

\_\_\_\_\_

Cut Out and Mail -- Return Request Required for Final Environmental Impact Report

Place  
Postage  
Here

Planning Department  
1660 Mission Street  
San Francisco, CA 94103

Attn: Hillary Gitelman, EIR Coordinator  
94.265E: 166-78 Townsend Street





